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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

OSCAR CARTER

SHELBY SUMMER BROWN

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Criminal No. 18-141
(18 U.S.C. §§ 1591(a), 1591(b)(2),
1591(c), 1594(a), 1594(c), 2,
2423(a), (d) and (e))

INDICTMENT

COUNT ONE

The grand jury charges:

On or about March 6, 2018, in the Western District of Pennsylvania and elsewhere, the defendants, OSCAR CARTER and SHELBY SUMMER BROWN, for the purpose of private financial gain, did knowingly and willfully transport or arrange, induce, procure, or facilitate the travel of Minor A, who had not attained the age of 18 years, in interstate commerce, from Ohio to Pennsylvania, with the intent that Minor A would engage in prostitution and other sexual activity for which a person could be charged with a criminal offense, and aided and abetted such conduct.

In violation of Title 18, United States Code, Sections 2, and 2423(a), (d) and (e).

FILED

JUN 05 2018

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WEST. DIST. OF PENNSYLVANIA

COUNT TWO

The grand jury further charges:

From on or about March 6, 2018, to on or about March 14, 2018, in the Western District of Pennsylvania and elsewhere, the defendants, OSCAR CARTER and SHELBY SUMMER BROWN, knowingly entered into an agreement to recruit, entice, harbor, transport, provide, obtain or maintain by any means, in and affecting interstate commerce, Minor A, a female minor who had not attained the age of 18 years, knowing or in reckless disregard of the fact that Minor A had not attained the age of 18 years of age, and did benefit financially and by receiving anything of value from participation in a venture engaged in such acts, knowing that Minor A would be caused to engage in a commercial sex act, and defendants OSCAR CARTER and SHELBY SUMMER BROWN knew of the unlawful purpose of the agreement, and they joined into the agreement willfully, that is, with the intent to further its unlawful purpose.

In violation of Title 18, United States Code, Section 1594(c).

COUNT THREE

The grand jury further charges:

From on or about March 6, 2018, to on or about March 14, 2018, in the Western District of Pennsylvania and elsewhere, the defendants, OSCAR CARTER and SHELBY SUMMER BROWN, attempted to and did knowingly recruit, entice, harbor, transport, provide, obtain and maintain by any means, in and affecting interstate commerce, Minor A, a female minor under the age of 18 years, and did benefit financially or by receiving anything of value from participation in a venture engaged in commercial sexual acts, knowing and in reckless disregard of the fact, and having had a reasonable opportunity to observe Minor A, that Minor A had not attained the age of 18 years and that Minor A would be caused to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a), 1591(b)(2), 1591(c), 1594(a), and 2.

FORFEITURE ALLEGATIONS

1. The allegations contained in Counts One through Three of this Indictment are incorporated herein by reference as though fully set forth herein for the purpose of alleging criminal forfeiture pursuant to Title 18, United States Code, Sections 2428 and 1594.

2. The United States hereby gives notice to the defendant(s) OSCAR CARTER and SHELBY SUMMER BROWN charged in Count One that, upon their conviction of such offense, the government will seek forfeiture: (a) in accordance with Title 18, United States Code, Sections 2428(a)(1), which requires any person convicted of such offense(s) to forfeit any property constituting or derived from proceeds obtained directly or indirectly as a result of such offense(s); and (b) in accordance with Title 18, United States Code, Section 2428(a)(2), which requires any person convicted of such offense(s) to forfeit any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violation, including but not limited to the following (hereinafter collectively referred to as the "Subject Property"):

- a. Dell Inspiron laptop computer s/n GYGWBV1
- b. Acer laptop computer s/n LXPY9020350380B30F2000
- c. LG model LGM5550 cellular phone s/n 704VTWP335329
- d. LG model LGM5550 cellular phone s/n 612VTHJ804377
- e. United States currency in the amount of \$ 1,746.00 .

3. The United States hereby gives notice to the defendant(s) OSCAR CARTER and SHELBY SUMMER BROWN charged in Count(s) Two and Three that, upon their conviction of any such offenses, the government will seek forfeiture: (a) in accordance with Title 18, United States Code, Sections 1594(d)(2), which requires any person convicted of such offense(s) to forfeit any property constituting or derived from proceeds obtained directly or indirectly as a result of such offense(s); and (b) in accordance with Title 18, United States Code, Section 1594(d)(1), which requires any person convicted of such offense(s) to forfeit any

property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violation, including but not limited to the following (hereinafter collectively referred to as the "Subject Property"):

- a. Dell Inspiron laptop computer s/n GYGWBV1
- b. Acer laptop computer s/n LXPY9020350380B30F2000
- c. LG model LGM5550 cellular phone s/n 704VTWP335329
- d. LG model LGM5550 cellular phone s/n 612VTHJ804377
- e. United States currency in the amount of \$ 1,746.00 .

WHEREFORE, the government seeks Forfeiture of the Subject Property pursuant to Title 18, United States Code, Sections 2428(a)(1), 2428(a)(2), 1594(d)(1), and 1594(d)(2).

A True Bill,


Foreperson



SCOTT W. BRADY
United States Attorney
PA ID No. 88352